

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

GREGORY J. SKIFF,

Plaintiff,

Case No. 18-cv-1690

v.

BMW FINANCIAL SERVICES NA, LLC,
CENTRAL CREDIT SERVICES LLC and
GEICO GENERAL INSURANCE COMPANY,

Defendants.

_____ /

NOTICE OF REMOVAL

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, defendant, Central Credit Services, LLC (“CCS”) through undersigned counsel, hereby removes this action from the Superior Court of New Jersey, Special Civil Part, Morris County, to the United States District Court for the District of New Jersey.

In support of this Notice of Removal, CCS states as follows:

1. Plaintiff Gregory J. Skiff, originally commenced this action by filing a complaint against CCS in the Superior Court of New Jersey, Special Civil Part, Morris County, where it is presently captioned as *Gregory J. Skiff v. BMW Financial Services NA, LLC, Central Credit Services, LLC and Geico General Insurance Company*, Dkt. No. MRS-DC-000563-18. No further proceedings before the State court have occurred.

2. In the complaint, plaintiff alleges statutory causes of action against CCS. A true and correct copy of plaintiff’s complaint is attached hereto as Ex. “A.”

3. Plaintiff accuses CCS of violating the Telephone Consumer Protection Act (“TCPA”), 47 U.S.C. § 227, *et seq.* CCS received plaintiff’s summons and complaint on or about January 29, 2018.

4. Upon information and belief, defendants BMW Financial Services NA, LLC and Geico General Insurance Company have yet received notice of this action.

5. This Court has jurisdiction over plaintiff’s claim pursuant to 28 U.S.C. §§ 1331 and 1441 in that the claim is founded on a claim or right arising under the laws of the United States.

6. This Notice of Removal is timely, having been filed within thirty (30) days of the date on which CCS received plaintiff’s complaint. *See* 28 U.S.C. § 1446.

7. All defendants that have been served with plaintiff’s Summons and Complaint, Central Credit Services, LLC, files this Notice of Removal. *See* 28 U.S.C. § 1446(b)(2)(A).

8. Written notice of this Notice of Removal of this action is being immediately provided to the Superior Court of New Jersey, Special Civil Part, Morris County. *See* Ex. “B.”

9. Written notice of this Notice of Removal of this action is being caused to be served on the plaintiff.

WHEREFORE, defendant, Central Credit Services, LLC, gives notice that this action is removed from the Superior Court of New Jersey, Special Civil Part, Morris County, to the United States District Court for the District of New Jersey.

Dated: February 7, 2018

Respectfully submitted,

/s/ Aaron R. Easley
Aaron R. Easley, Esq.
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Attorney for Defendant,
Central Credit Services, LLC

CERTIFICATE OF SERVICE

I hereby certify that on February 7, 2018, a copy of the foregoing was electronically filed with the Clerk of the Court, United States District Court for the District of New Jersey and served upon the following via U.S. Mail:

Gregory J. Skiff
Y8 Farmhouse Lane
Morristown, NJ 07960
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Email: skiffg@outlook.com
Plaintiff, Pro Se

By: /s/ Aaron R. Easley
Aaron R. Easley, Esq.
Attorney for Defendant,
Central Credit Services, LLC